

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



United States
Environmental Protection
Agency

Office of Pesticide Programs

MEMORANDUM

3/1/2018

SUBJECT: Product Chemistry Review for **Thymox Disinfectant Spray** EPA Reg. No.:
87742-1

FROM: Salvador Rodriguez
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

THRU: Karen P. Hicks, Team Leader
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

TO: Jacqueline Hardy, PM Team 34 / Stacey Grigsby
Regulatory Management Branch II
Antimicrobials Division (7510P)

Registrant: Laboratorie
M2

Action code: A570

Agency Due Date:
3/20/2018

Science Due Date:
02/18/18

DP No.: 444590
Submission No.: 1011091

E-Sub No.:

Classification: EP

Process: Integrated system

Pesticide type: Sanitizer

| Formulation from label | | | |
|------------------------|----------|----------------------|----------|
| PC code(s) | CAS #(s) | Active Ingredient(s) | % weight |
| 080402 | 89-83-8 | Thymol USP | 0.23 |
| | | | |

03/07/18

I. BACKGROUND

The Registrant, Laboratorie M2, has submitted a data to support Reregistration for their product: **Thymox Disinfectant Spray** EPA Reg. No. 87742-1.

II. RELEVANT DOCUMENTS

| | RECEIVED | N/A |
|--|-------------------------------------|--------------------------|
| EPA FORM 8570-27 – Formulator’s Exemption Statement | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| EPA FORM 8570-35 – Data Matrix (enter date)10/26/17 | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Cover letter (10/26/2017) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Transmittal document | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Proposed CSF Alternate #s: (10 thru 16) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Proposed label, (10/3/2017) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Certification for Pilot Fragrance Notification Program | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | <input type="checkbox"/> | <input type="checkbox"/> |
| REFERENCED: CSF BASIC , (3/14/2012) | -- | |
| Comments: | | |

III. FINDINGS

a. Product Formulation:

| | TGAI | MUP | EUP | Food use | Non-food use |
|--|-------------------------------------|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| Non-integrated | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Integrated | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | | |
| | | | | | |
| Active Ingredient | Nominal | | Upper limit | Lower limit | |
| Thymol USP | 0.23 | | 0.253 | 0.207 | |
| | | | | | |
| | YES | | NO | N/A | |
| 1. The certified limits of all ingredients are within 40 CFR standard certified limits. | <input checked="" type="checkbox"/> | | <input type="checkbox"/> | | |
| 2. Wider certified limits were requested and rationale was accepted. | <input type="checkbox"/> | | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 3. The nominal concentration(s) of the active ingredient is in agreement with the label. | <input checked="" type="checkbox"/> | | <input type="checkbox"/> | | |

| | | | |
|---|-------------------------------------|--------------------------|-------------------------------------|
| 4. The chemical IDs and analytical information for density, pH, and flammability are consistent with Series 830 Group B data. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 5. All inert ingredients are approved for non-food use pesticide formulations. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. The impurities present >0.1% are identified. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 7. Impurities of toxicological significance have an upper certified limit. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

b. Product Label:

| | Yes | NO | N/A |
|---|-------------------------------------|-------------------------------------|-------------------------------------|
| <i>The formula contains one of the following:</i> | | | |
| 1. 10% or more of petroleum distillate | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. 1.0% or more of methyl alcohol | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. Sodium nitrite at any level | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4. A toxic list 1 inert at any level | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 5. Arsenic in any form | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 6. If yes to 1-5, then the inert ingredient list contains a relevant footnote | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 7. Appropriate warning statements regarding flammability or explosive characteristics of the product are included on the label | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 8. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. The product requires an expiration date at which time the nominal concentration falls below the lower certified limit. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

IV. Additional Findings: None

V. Conclusion:

Product Science Branch of Antimicrobials Division finds the proposed OPPTS Guideline Series 830.1700 "Preliminary analysis" and Confidential Statements of Formula, dated 10/26/17, for the alternate #s: (10 thru 16) formulations, supporting the sanitizer, integrated, non-food use, end-use product **87742-1** to be **acceptable**.

VI. Table A:
Series 830 guidelines – Group A

| OPPTS# | Name | Status | MRID |
|----------|----------------------|------------|----------|
| 830.1700 | Preliminary analysis | Acceptable | 50490005 |